

From: Mary Moo [mmoo@whfc.org]
Sent: Monday, December 15, 2003 4:56 PM
To: adoptionregs@state.gov
Subject: Adoption Regulations feedback

docket number State/AR-01/96 for Part 96

Regarding: Section V,C, Subpart F section 96.37

As an agency that will fall into the category of needing to be an accredited agency we anticipate that we will also need to supervise other entities involved in the adoption process. This section requires that "individuals performing home studies or child background studies to have a minimum of a master's degree in social work education". Our main area of concern with this section is regarding the "child background studies." While this would not be an issue for our agency when assisting and overseeing the placement of a child within the U.S. it presents significant difficulties for our overseas programs. Based on our experience most countries that we have worked in for the past 29 years rarely have MSW's complete the child background studies. While MSWs may exist in a few of the developing countries that place children internationally (i.e. Philippines) it is very unusual. Some countries we have worked in do not appear to have Schools of Social Work let alone a master level curriculum (i.e. Cambodia). We feel this requirement does not accurately reflect overseas conditions and availability of people with MSW degrees. We also feel that this requirement will unnecessarily limit and delay appropriate children in need from joining a family. In many countries only basic medical evaluations are provided when an adoptive family is considering a child for adoption. Our agency requires that this evaluation be done by a physician.

If you would like further details about our concern over this area please contact me at my home phone number on Tuesdays and Fridays (978-897-8055) or my work phone number on Monday, Wednesday and Thursdays.

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